

PAUL L. REIN, Esq. (SBN 43053)
AARON M. CLEFTON, Esq. (SBN 318680)
REIN & CLEFTON, Attorneys at Law
200 Lakeside Drive, Suite A
Oakland, CA 94612
Telephone: (510) 832-5001
Facsimile: (510) 832-4787
info@reincleftonlaw.com

IRAKLI KARBELASHVILI, Esq. (SBN 302971)
ALL ACCESS LAW GROUP
1400 Coleman Ave Ste F28
Santa Clara, CA 95050
Telephone: (408) 295-0137
Fax: (408) 295-0142
irakli@allaccesslawgroup.com

CATHERINE CABALO, Esq. (SBN 248198)
PEIFFER WOLF CARR KANE CONWAY & WISE, LLP
4 Embarcadero Center, Suite 1400
San Francisco, CA 94111
Telephone: (415) 766-3592
Facsimile: (415) 402-0058
ccabalo@peifferwolf.com

Attorneys for Plaintiff
CHRISTINE DiBELLA

**Defense counsel listed after caption*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINE DiBELLA,

Plaintiff,

v.

BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY;
COMPASS GROUP USA, INC. dba
CHARTWELLS HIGHER EDUCATION,

Defendants.

CASE NO. 4:21-cv-08461-HSG
Civil Rights

**STIPULATION AND ORDER CONTINUING
DEADLINES FOR PLAINTIFF TO FILE
AMENDED COMPLAINT & DEADLINES
ASSOCIATED WITH GENERAL ORDER 56**

ALISON K. BEANUM, State Bar No. 221968
alison.beanum@clydeco.us
DOUGLAS J. COLLODEL, State Bar No. 112797
douglas.collodel@clydeco.us
CLYDE & CO US LLP
355 South Grand Avenue, Suite 1400
Los Angeles, California 90071
Telephone: (213) 358 7600
Facsimile: (213) 358 7650

Attorneys for Defendant
BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY

Nathan V. Okelberry (SBN 266596)
nokelberry@fisherphillips.com
Justin Hall (SBN 329464)
jhall@fisherphillips.com
FISHER & PHILLIPS LLP
444 South Flower Street, Suite 1500
Los Angeles, California 90071
Telephone: (213) 330-4500
Facsimile: (213) 330-4501

Attorneys for Defendant
COMPASS GROUP USA, INC.

STIPULATION

Plaintiff CHRISTINE DiBELLA (“Plaintiff”) and Defendants BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY; COMPASS GROUP USA, INC. dba CHARTWELLS HIGHER EDUCATION (“Defendants”) – Plaintiff and Defendants together the “Parties” – hereby stipulate and request that the deadline for Plaintiff to file an Amended Complaint be continued to March 4, 2022 and related deadlines, including General Order 56 deadlines, be continued accordingly. This request to continue deadlines is based on the following good cause:

1. Presently, the deadline for Plaintiff to file an Amended Complaint is February 11, 2022. Dkt. No. 25.
2. Plaintiff and Defendant COMPASS GROUP USA, INC. dba CHARTWELLS HIGHER EDUCATION (the private entity Defendant) are currently engaging in productive discussions to resolve the dispute between them. The Parties believe that continuing the deadline for Plaintiff to file an Amended Complaint to March 4, 2022, may allow for resolution of the case between Plaintiff and Defendant COMPASS GROUP USA, INC. dba CHARTWELLS HIGHER EDUCATION. The Parties do not wish to expend judicial resources or attorneys’ fees on including the private entity Defendant in the Amended Complaint if an expedient resolution is possible.
3. Pursuant to the above, the Parties jointly stipulate and request that the Court continue case deadlines as follows:

- Deadline for Plaintiff to file an Amended Complaint: March 4, 2022;
- Deadline for Defendants to respond to the Amended Complaint: March 25, 2022;
- Deadline for Parties to exchange initial disclosures: April 8, 2022;
- Deadline for Parties to hold a joint site inspection of the subject premises: April 15, 2022;
- Deadline for Parties to hold a video conference meeting of parties: May 20, 2022;
- and
- Deadline to file a Notice of Need for Mediation: May 27, 2022.

IT IS SO STIPULATED.

Date: February 10, 2022

PEIFFER WOLF CAR KANE & CONWAY LLP

/s/ Catherine Cabalo
By CATHERINE CABALO, Esq.
Attorneys for Plaintiff
CHRISTINE DiBELLA

Date: February 10, 2022

CLYDE & CO US LLP

/s/ Alison K. Beanum
By ALISON K. BEANUM, Esq.
Attorney for Defendant
BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY

Date: February 10, 2022

FISHER & PHILLIPS LLP

/s/ Nathan V. Okelberry
By NATHAN V. OKELBERRY, Esq.
Attorney for Defendants
COMPASS GROUP USA, INC

FILER'S ATTESTATION

Pursuant to Local Rule 5-1, I hereby attest that on February 10, 2022, I, Catherine Cabalo, attorney with Peiffer Wolf Carr Kane Conway & Wise, LLP, received the concurrence of Nathan V. Okelberry, Esq. and Alison Beanum, Esq. in the filing of this document.

/s/ Catherine Cabalo
Catherine Cabalo

ORDER

Pursuant to the stipulation of the parties and for good cause shown, case deadlines shall be continued as follows:

Deadline for Plaintiff to file an Amended Complaint: March 4, 2022;

Deadline for Defendants to respond to the Amended Complaint: March 25, 2022;

Deadline for Parties to exchange initial disclosures: April 8, 2022;

Deadline for Parties to hold a joint site inspection of the subject premises: April 15, 2022;


Deadline for Parties to hold a video conference meeting of parties: May 20, 2022;

and

Deadline to file a Notice of Need for Mediation: May 27, 2022.

IT IS SO ORDERED.

Dated: 2/11/2022


Honorable Haywood S. Gilliam, Jr.
U.S. District Court Judge